



CONSULTATION MATERIAL

General requirements for certification bodies including
certification transfer and auditor training programme



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A. Introduction

FSC is revising the general accreditation standard <FSC-STD-20-001 V4-0 General Requirements for FSC Accredited Certification Bodies> (FSC-STD-20-001). The standard ensures that FSC certifications are managed in a competent, consistent, impartial, transparent, rigorous, reliable and credible manner. The standard is revised together with two related procedures <FSC-PRO-20-003 Transfer of FSC Certificates and License Agreements> (FSC-PRO-20-003) and <FSC-PRO-20-004 General Requirements for FSC Training Programme> (FSC-PRO-20-004).

As part of the drafting phase, FSC is now conducting a public consultation. This consultation aims to get stakeholder feedback on the draft requirements.

What are the key changes?

Key changes	Why it matters	Reference to the Draft
<p>Changes triggered by EC regulation 765/2008:</p> <ul style="list-style-type: none"> - Obtaining and maintaining accreditation as per ASI Two-Tier Assurance Program. - ISO 17065 as basis for accreditation. 	<p>FSC introduced the process for accreditation and the conformity with ISO 17065 as a mandatory accreditation requirement.</p>	<p>Draft 2-0 of FSC-STD-20-001 V5-0</p> <p>Section 1, 2 and 3</p>
<p>Alignment with ISO 17065</p>	<p>The alignment of FSC-STD 20-001 with ISO 17065 leads to necessary changes to the concept of handling nonconformities including the closure of nonconformity timelines, timeline for making certification decisions and conditions for granting and maintaining certification.</p>	<p>Draft 2-0 of FSC-STD-20-001 V5-0</p> <p>Section 7</p>
<p>Proposal to introduce risk-based approaches to auditing.</p>	<p>Risk-based approach towards applying additional evaluation measures in case of high integrity risk is added.</p>	<p>Draft 2-0 of FSC-STD-20-001 V5-0</p> <p>Annex 4</p>
<p>Changes to the related procedures include the provision for online trainings for auditor candidates and clarification around the transfer of certification from one certification body to another.</p>	<p>FSC introduced the provision for online trainings for auditor candidates for chain of custody. For forest management trainings the in-person component is kept as mandatory for the initial training.</p> <p>In terms of transfer of certification, the process for voluntary and non-voluntary transfers is clarified.</p>	<p>Draft 2-0 of FSC-STD-20-001 V5-0</p> <p>Annex 6</p> <p>Draft 1-0 of FSC-PRO-20-004 V2-0</p> <p>Part1, Section 3</p>

FSC encourage all participants to provide input to the complete draft, however considering the diverse stakeholder groups, FSC has not made it mandatory to fill all sections in the public consultation. This allows the stakeholders participating in the consultation to skip any section.

FSC-STD-20-001 is amended to ensure conformity with ISO 17065:2012 Conformity assessment — Requirements for bodies certifying products, processes and services (ISO/IEC 17065:2012). These amendments have resulted in alignment needs of the FSC normative framework, notably of the forest management (FM) and chain of custody (CoC) specific requirements for certification bodies as stipulated in <FSC-STD-20-007 Forest Management Evaluations> (FSC-STD-20-007) and <FSC-STD-20-011 Chain of Custody Evaluations> (FSC-STD-20-011). To this end FSC will conduct a 30-day public consultation of the amended draft FSC-STD-20-007 and FSC-STD-20-011 during the last 30 days of the public consultation of FSC-STD-20-001.

B. FSC-STD- 20-001 V5-0 D2-0 General Requirements for Accreditation of Certification Bodies

Leading elements of the draft

Leading elements include the Introduction, Scope, and Terms and Definitions. These elements describe the objective of the document, general description of the FSC assurance system with reference to the impact of Regulation (EC) 765/2008 on Requirements for Accreditation and Market Surveillance and how to read the document with reference to ISO 17065:2012 Conformity assessment — Requirements for bodies certifying products, processes and services. Scope section in the leading elements specify to whom this standard applies.

The standard only presents the FSC specific requirements, any duplicative requirements from the ISO/IEC 17065:2012 are removed from the draft. To assist users in identifying the specified FSC requirements in relation to ISO/IEC 17065:2012, we are using the same section heading and numbering from section 4 'General requirements' onward.

Questions for feedback

1. Is the structure and content of the leading elements clear and easy to follow?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

2. Are section headings names and numbering clear and easy to follow with reference to the ISO/IEC 17065:2012?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

1) Accreditation process

This section includes the requirements of the accreditation process for certification bodies operating within European Economic Area and United Kingdom and outside.

Questions for feedback

3. Do you agree with requirements included in the accreditation process section?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

2) Accreditation scope

This section includes the requirements for certification bodies to define their accreditation scope. The accreditation scope of a certification body is based on two components a) technical scope and b) geographical scope. There are four (4) key changes introduced in this section:

- I. withdrawal of option to exclude controlled forest management from forest management accreditation scope. This is because the revised version of FSC-STD-30-010 FSC Controlled Wood Standard for Forest Management is a subset of FSC-STD-60-004 FSC International Generic Indicators and will be evaluated by standard FSC-STD-20-007 Forest Management Evaluations. In addition to this change, ASI will also be phasing out the controlled wood (CW) CoC optional scope following the alignment between FSC and ASI as CW is a mandatory part of CoC accreditation scope;

- II. introduction of mandatory and optional certification standards within technical accreditation scope;
- III. introduction of geographical scope;
- IV. requirement for voluntary change in certification body's accreditation scope.

Questions for feedback

4. **Do you agree with the change of withdrawal of option to exclude the controlled forest management from forest management accreditation scope (Clause 2.2)?**
 - a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale
5. **Do you agree with the requirement of mandatory and optional certification standards as part of the technical accreditation scope? (Clause 2.3)?**
 - a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale
6. **Do you agree with the requirement for introducing the geographical scope as part of accreditation scope (Clause 2.4)?**
 - a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale
7. **Do you agree with applying the requirements for change of accreditation scope by ASI to the cases where certification bodies voluntary ask for a change in accreditation scope (Clause 2.5)?**
 - a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale
8. **Do you have any other feedback regarding this section?**

3) Conformity with ISO 17065 and relevant accreditation requirements

This section includes the requirements that a certification body needs to fulfill in order to obtain and to maintain its accreditation status. The key change introduced in this section is that it is mandatory for all FSC-accredited certification bodies to conform with ISO/IEC 17065:2012. This made it necessary for FSC to also align FSC specific requirements with ISO/IEC 17065:2012. This key change is the outcome of the implementation of Regulation (EC) 765/2008 on Requirements for Accreditation and Market Surveillance at the European Economic Area (EEA) and at the United Kingdom (UK) level and FSC needs to adapt its requirements in order to operate within EEA and UK.

9. **Do you agree with the requirements included in this section?**
 - a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale
10. **Do you have any other feedback regarding this section?**

4) General requirements

This section includes the requirements for legal and contractual matters, management of impartiality, liability and financing, non-discriminatory conditions, confidentiality, and publicly available information.

Key change in this section is that the duplicative requirements from ISO/IEC 17065:2012 are removed, this includes:

4.1 Legal and contractual matters

Following are the requirements from V4-0 of STD-20-001 that are not added in the V5-0 because they are already part of ISO 17065 and do not contain any FSC specific elements:

1.1.1 The certification body shall be a legal entity, or a defined part of a legal entity, such that the legal entity can be held legally responsible for all its certification activities.

1.2.2 The certification body shall ensure that a legally enforceable certification agreement is signed by the relevant parties prior to the main evaluation ~~and after the client has obtained a 'License Agreement for the FSC Certification Scheme'.~~

1.2.3:

a) conform with all applicable certification requirements;

b) conform with any conditions set by the certification body for granting or maintaining certification;

i) make claims regarding certification consistent with the scope of certification and not making any claims of conformity (or near conformity) with FSC requirements until and unless certification is granted;

l) inform the certification body within ten (10) days of changes in the ownership, structure of the organization (e.g. changes in key managerial staff), certified management systems or circumstances which relate to the implementation of FSC certification requirements;

k) keep a record of all complaints made known to it relating to conformity with certification requirements and make these records available to the certification body when requested, and:

i) take appropriate action with respect to such complaints and any deficiencies found in products that affect conformity with FSC certification requirements;

j) document the actions taken.

11. Do you agree with the removal of requirements from section 4.1?

a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

12. Do you agree with the applicability of the ISO/IEC 17065:2012 requirement to section 4.1?

a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

4.2 Management of impartiality

Following are the requirements from V4-0 of STD-20-001 that are not added in the V5-0 because they are already part of ISO 17065 and do not contain any FSC specific elements:

1.5.1 The certification body shall be responsible for ensuring that certification activities are undertaken impartially and shall not allow commercial, financial or other pressures to compromise impartiality.

1.5.2 The certification body shall have top management commitment to impartiality.

1.5.3 All certification body personnel (either internal or external) and committees involved in certification activities shall act impartially.

1.5.4 The certification body and any part of the same legal entity and entities under its organizational control or controlling it shall not offer or provide consultancy within the scope of accreditation to its clients, in conformity with the requirements specified in Annex 1.

1.5.6 The certification body shall identify, analyse and document risks to its impartiality on an ongoing basis. This shall include those risks that arise from its activities, from its relationships, or from the relationships of its personnel. However, such relationships may not necessarily present a certification body with a risk to impartiality.

NOTE: A relationship presenting a risk to impartiality of the certification body can be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing (including branding), and payment of a sales commission or other inducement for e.g. the referral of new clients.

- 1.5.7 If a risk to impartiality is identified, the certification body shall be able to demonstrate how it eliminates or mitigates such risk.
- 1.5.8 The certification body shall ensure that activities of separate legal entities with which it has relationships, do not compromise the impartiality of its certification activities. This also applies to separate legal entities that have a relationship with the legal entity of which the certification body forms a part of.
- 1.5.9 When a separate legal entity offers or provides consultancy, the certification body's management personnel and personnel in the audit, review and certification decision-making process shall not be involved in the consultancy activities of the separate legal entity. The personnel of the separate legal entity shall not be involved in the management of the certification body, audit, review, or the certification decision.
- 1.5.10 The certification body's activities shall not be marketed or offered as linked with the activities of an organization that provides consultancy, implying that certification would be easier, faster or less expensive if a specified consultancy organization were used

13. Do you agree with the removal of requirements from section 4.2?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

14. Do you agree with the applicability of the ISO/IEC 17065:2012 requirements to section 4.2?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

4.3 Liability and financing

Following are the requirements from V4-0 of STD-20-001 that are not added in the V5-0 because they are already part of ISO 17065 and do not contain any FSC specific elements:

- 1.6.1 The certification body shall be able to demonstrate that it has:
- a) evaluated the risks arising from its certification activities, and
 - b) that it has adequate arrangements (e.g. insurance or reserves) to cover liabilities arising from its operations in each of its fields of activities and the geographic areas in which it operates.
- 1.6.2 The certification body shall have the financial stability and resources required for its operations.

15. Do you agree with the removal of requirements from section 4.3?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

16. Do you agree with the applicability of the ISO/IEC 17065:2012 requirements to section 4.3?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

4.4 Non-discriminatory conditions

Following are the requirements from V4-0 of STD-20-001 that are not added in the V5-0 because they are already part of ISO 17065 and do not contain any FSC specific elements:

- 1.7.1 The policies and procedures under which the certification body operates, and the administration of them, shall be non-discriminatory. Procedures shall not be used to impede or inhibit access to the certification process by clients, other than as provided for in FSC requirements.
- 1.7.2 Access to the certification process shall not be conditional upon the size of the client or membership of any association or group, nor shall certification be conditional upon the number of certifications already issued. There shall not be undue financial or other conditions.
- 1.7.3 Notwithstanding the requirements of Clauses 1.7.1 and 1.7.2 above, a certification body can deny certification to a client when fundamental and demonstrated reasons exist (e.g. illegal activities).

17. Do you agree with the removal of requirement from section 4.4?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

18. Do you agree with the applicability of the ISO/IEC 17065:2012 requirement to section 4.4?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

4.5 Confidentiality

Following are the requirements from V4-0 of STD-20-001 that are not added in the V5-0 because they are already part of ISO 17065 and do not contain any FSC specific elements:

- 1.8.1 The certification body shall be responsible, through legally enforceable commitments, for the management of all information obtained or created during the performance of certification activities. Information is considered proprietary and shall be regarded as confidential, except for information that the client makes or is required to make publicly available, that FSC and ASI are entitled to access, or when agreed between the certification body and the client (e.g. for the purpose of responding to complaints).
- 1.8.3 When the certification body is required by law or authorized by contractual arrangements to release confidential information, the client or person concerned shall, unless prohibited by law, be notified of the information provided.
- 1.8.4 Information about the client that is not publicly available and is obtained from sources other than the client (e.g. from a complainant) shall be treated as confidential, unless the source of information and the client give written consent to disclose it.

19. Do you agree with the removal of requirement from section 4.5?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

20. Do you agree with the applicability of the ISO/IEC 17065:2012 requirement to section 4.5?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

4.6 Publicly available information

Following are the requirements from V4-0 of STD-20-001 that are not added in the V5-0 because they are already part of ISO 17065 and do not contain any FSC specific elements:

- 1.10.1 The certification body shall maintain, and make easily accessible on its website, the following:
- b)a description of the sources of funding and general information on the fees charged to clients;

d) a description of the rights and duties of clients, including requirements, restrictions or limitations on the use of the certification body's name and FSC trademarks and on the ways of referring to the certification granted;

e) information about procedures for handling complaints and appeals;

Following ISO requirement was not part of V4-0 FSC-STD-20-001

4.7 a) information about (or reference to) the certification scheme(s), including evaluation procedures, rules and procedures for granting, for maintaining, for extending or reducing the scope of, for suspending, for withdrawing or for refusing certification;

With V5-0 of FSC-STD-20-001, the ISO 17065 will become indispensable, therefore certification bodies also require to make these documents available to public to conform with ISO 17065.

21. Do you agree with the removal of requirement from section 4.6?

a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

22. Do you agree with the applicability of the ISO/IEC 17065:2012 requirement to section 4.6?

a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

23. Do you have any other feedback regarding this section?

5) Structural Requirements

This section includes the requirements for certification body's organizational structure and for mechanism for safeguarding impartiality. The key change in this section is that the duplicative requirements from ISO/IEC 17065:2012 are removed.

Following are the requirements from V4-0 of STD-20-001 that are not added in the V5-0 because they are already part of ISO 17065 and do not contain any FSC specific element:

2.1.1 The certification body shall document its organizational structure, showing duties, responsibilities and authorities of management and other certification personnel and any committees and entities under the organizational control of the certification body. When the certification body is a defined part of a legal entity, the structure shall include the line of authority and the relationship to other parts within the same legal entity.

2.1.2 The management of the certification body shall identify the board, group of persons, or person having overall authority and responsibility for each of the following:

- a) management system of the certification body (see Section 2);
- b) contractual arrangements;
- c) delegation of authority to committees or personnel (where applicable);
- d) personnel competence requirements (see 3.1 and Annex 2);
- e) reviewing the independence of the certification body;
- f) resolution of complaints and appeals;
- g) development of certification activities;
- h) provision of adequate resources for certification activities;
- i) development of certification requirements;
- j) evaluation (see Sections 4.3, 4.4 and 4.5);
- k) supervision of the finances of the certification body.

1.5.13 The certification body shall have a committee for safeguarding its impartiality. The committee shall provide input on the following:

- a) the policies and procedures relating to the impartiality of its certification activities;
- b) any tendency on the part of a certification body to allow commercial or other considerations to prevent the consistent impartial provision of certification activities;
- c) matters affecting impartiality and confidence in certification.

1.5.14 The committee's terms of reference shall be documented to ensure the following:

- a) a balanced representation of interested parties, such that no single interest predominates (internal or external personnel of the certification body are considered to be a single interest, and shall not predominate);

NOTE 2: Interested parties can include clients of the certification body, customers of clients, manufacturers, suppliers, users, conformity assessment experts, representatives of industry trade associations, representatives of governmental regulatory bodies or other governmental services, and representatives of non-governmental organizations, including consumer organizations.

- b) access to all the information necessary to enable it to fulfil all its functions;

NOTE 3: This includes the documents mentioned in Clauses 1.5.5, 1.5.6, 1.5.7, 1.5.13, as well as other documents, such as information about the organizational structure, relevant management reports and results of external assessments, where they exist.

1.5.15 If the top management of the certification body does not follow the recommendations of this committee, the committee shall have the right to take independent action (e.g. informing authorities, ASI, stakeholders). In taking appropriate action, the confidentiality requirements of Section 1.8 relating to the client and certification body shall be respected.

24. Do you agree with the removal of requirements from section 5?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

25. Do you agree with the applicability of the ISO/IEC 17065:2012 requirement to section 5?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

26. Do you have any other feedback regarding this section?

6) Resource Requirement

This section includes the requirements for certification body personnel involved in the certification process and the resources for evaluation. Key change in this section is the alignment with ISO/IEC 17065:2012 which means FSC listed requirement in addition to and on top of ISO/IEC 17065:2012.

Where no additional requirements are listed, the requirements from ISO/IEC 17065:2012 apply as they are.

Following are the requirements from V4-0 of STD-20-001 that are not added in the V5-0 because they are already part of ISO 17065 and do not contain any FSC specific element:

3.2.6 The certification body shall:

- a) have documented policies, procedures and records for managing the relationship with bodies providing outsourced services according to the requirements in this standard, unless the option of outsourcing is explicitly excluded by the certification body;

- b) ensure that the body that provides outsourced services, and its personnel undertake certification services impartially;
- c) maintain a list of approved providers of outsourced services;
- d) implement corrective actions for any breaches of the outsourcing agreement or other requirements of which it becomes aware;
- e) inform the client in advance of outsourcing activities, in order to provide the client with an opportunity to object.

27. Do you agree with the FSC requirements and applicability of the ISO/IEC 17065:2012 requirement to section 6.1?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

28. Do you agree with the FSC requirements and applicability of the ISO/IEC 17065:2012 requirement to section 6.2?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

29. Do you agree with the removal of requirement from section 6.2?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

30. Do you have any other feedback regarding this section?

7) Process requirements

This section includes the overall requirements for a certification process, starting from application until making the certification decision and registering the certified product and relevant data on FSC certification database. This section also includes the requirements for maintaining the records for certification activities and handling complaints and appeals.

Key change in this section is the alignment with the elements of the functional approach as presented in ISO/IEC 17000:2020 Conformity assessment — Vocabulary and general principles. The elements of the functional approach include selection, determination (audit), review of evaluation results, certification decision and certification. In addition to the alignment with the functional approach (ISO/IEC 17000:2020), this section is also aligned with ISO/IEC 17065:2012.

ISO/IEC 17065:2012 requires that nonconformities have been corrected before a certification decision is taken, including the decision to grant certification as well as to maintain certification following a surveillance evaluation (see also ISO 17067:2013 Conformity assessment — Fundamentals of product certification and guidelines for product certification schemes, Table 1). In the process to obtain system acceptance in the European Economic Area by the German national accreditation body DAkkS, FSC is applying to be accepted as a 'scheme type 6' as per ISO 17067:2013 for the certification of processes.

The ISO approach has considerable implications for the FSC certification system. FSC differentiates between minor and major nonconformities and between correction of nonconformities and actions to prevent the recurrence of nonconformities. ISO standards do not make a distinction between minor and major nonconformities and only refer to the correction of nonconformities. The guiding principle in revising the requirements was to introduce the necessary changes to meet ISO/IEC 17065:2012 while still giving room to implement the FSC specific requirements to the extent possible.

This section also presents changes to strengthen the integrity of the system and to ensure an effective certification process. The changes include:

- A) List of minimum information that certification body obtains from applicants (ref. section 7.2).

- B) Closure of nonconformities is changed to applying 'corrections' and implementing 'corrective actions' where 'correction action' is only required for major nonconformities (ref. Terms and Definitions, clause 7.4.11).
- C) Timeline to close nonconformities for main evaluation: before the certification decision and certification cannot be granted with open minor and major nonconformities (ref. clause 7.4.12).
- D) Timeline to close nonconformities for surveillance: 3 months from audit closing meeting to apply corrections and 15 months from audit closing meeting to implement any corrective actions (ref. clause 7.4.12).
- E) FSC proposed changes to the requirements to close nonconformities in a surveillance evaluation:

Proposed changes to the requirements to close nonconformities in a surveillance evaluation (ref. Clause 7.4.12, 7.4.16, 7.6.2):

Topic and requirements for closure of nonconformities is still under discussion with working group of this revision process. The requirements for closure of nonconformities have been reviewed by FSC consultants and working group members and are tested with some certification bodies. FSC is proposing an alternative to address the comments received as part of review and testing of Draft 1-0. Please note that this proposal is only about the closure of nonconformities in a surveillance evaluation. The key change is to add an additional one month after the audit closing meeting to finalize the evaluation report and this would change the timeline to apply corrections for both minor and major nonconformities from three (3) months to four (4) months. The purpose of adding this proposal to the public consultation is to collect stakeholder feedback before deciding to include it in the standard. This means that depending on the feedback, working group review and internal discussion, FSC will decide if any amendment to the requirements included in the Draft 2-0 is needed or not.

Evaluation

1. The certification body shall present the nonconformities and observations during the audit closing meeting (ref. 7.4.8)
2. The certification body shall document the identified nonconformities and share the nonconformity report with the client within one (1) month of audit closing meeting (new clause).
3. For a surveillance evaluation, the client will have four (4) months to apply correction to all open nonconformities and fifteen (15) months to implement corrective actions (ref. clause 7.4.12)

Review

There is no change proposed.

Decision making (for surveillance evaluation)

The certification body shall make the certification decision according to the following maximum timeline and requirements.

Within four (4) months of the audit closing meeting. (ref. clause 7.6.2). In case of five (5) or more major nonconformities, the timeline to make certification decision is same as included in the Draft 2-0 (ref. clause 7.6.2)

- F) Duplicative requirements from ISO/IEC 17065:2012 are removed from section 7.5 review.
- G) Timeline for certification decision for surveillance evaluation is added as 3 months from the audit closing meeting and 30 days in case of 5 or more major nonconformities (ref. clause 7.6.2).
- H) FSC certification document is a formal certification document and additional element to the certification scope and statement of certification is added (ref. clause 7.7.1 to 7.7.9)

- I) 15 months rule for chain of custody surveillance evaluation is amended to once per calendar year (ref. clause 7.9.1)
- J) No maintenance of certification with open nonconformities (ref. 7.9.3)
- K) Requirements to change the scope of certification are clarified by adding clarity to conduct an audit and signing of TLA according to the operation model (single, multi-site, group) (ref. clause 7.11.2)
- L) Requirement to notify clients 6 months in advance in cases of terminating all clients in a specific country or region and requirement to suspend certification where receiving evidence from FSC or ASI of a breach of certification contract by the client (ref. clause 7.11.4)
- M) Under complaints and appeals section, a reference to handling vexatious and persistent complaints is added and a requirement for certification body to submit annual overview summary of to FSC is added. A template to annual over summary of complaints is prepared and attached to this consultation for feedback (ref. 7.13.2 and 7.13.3).

Questions for feedback

31. Do you agree with the requirements included in 7.1 General?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

32. Do you agree with the requirements included in 7.2 Application and with FSC specified requirement for collection of information?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

33. Do you agree with the requirements for the closure of nonconformities (ref. clause 7.4.6 onwards)?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

34. Do you agree with the proposed changes (alternative) to the requirements for the closure of nonconformities in a surveillance evaluation as added in the consultation?

- b) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

35. Do you think the timelines to close the nonconformities for both FM and CoC are viable? If not please provide examples)?

36. Do you agree with the requirements included in 7.4 Evaluation (apart from feedback to 7.4.6 onwards)?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

37. Do you agree with the requirements included in 7.5 Review?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

38. Do you agree with the requirements for making certification decisions including certification decision timeline included in 7.6 Certification decision?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

39. Do you agree with the requirements for certification documentation including statement of certification included in 7.7 Certification documentation and 7.8 Directory of certified product?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

40. Do you agree with the requirements for surveillance frequency and not maintaining certification with open nonconformities included in 7.9 Surveillance?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

41. Do you agree with the requirements for changes in the scope of certification (clause 7.11.2), giving 6 months' notice to clients (clause 7.11.4) and other as included in 7.11 Termination, reduction...of certification?

a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

42. Do you agree with the requirements included in 7.13 Complaints and appeals?

a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

43. Do you have any feedback to the template for submitting annual overview summary of complaints to FSC?

44. Do you have any other feedback regarding section 7?

8) Management system requirements

This section includes the management system requirements for certification bodies which include the management system requirements for both with and without ISO 9001:2015 certification.

45. Do you agree with the requirements included in section 8 management system requirements?

a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

Annex 1 Avoidance of conflict of interest

This is a normative annex and includes the requirements and additional guidance to certification bodies around avoidance of conflict of interest.

46. Do you agree with the requirements included in Annex 1?

a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

Annex 2 Qualification requirements for FM and CoC auditor candidates and auditors

This is a normative annex and includes the requirements for auditor's initial and ongoing qualification requirements. The key changes in this annex include:

1. **Forest management auditor candidates and auditors (ref. Table 2):** Professional experience with secondary education is reduced from ten (10) years to six (6) years.
2. **Chain of custody auditor candidates and auditor (ref. Table 3):** Professional experience other than auditor with ISEAL membership is considered equivalent to experience in forest products sector.

47. Do you agree with the requirements included in Annex 2?

a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

Annex 3 Audit Teams

This is a normative annex and includes the requirements for selecting an audit team in accordance with the type of audit. The key changes in this annex include:

1. For forest management audits: having expertise or expert to audit the relevant Principle and Criteria (P&C) and having social expertise or expert to audit P&C included in clause 1.5.2 of Annex 2.
2. For chain of custody audits: having team member with expertise in FSC core labour requirements.

48. Do you agree with including social expertise/expert in the audit team where required as outlined in Annex 3?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

Annex 4 Risk-based approach to apply specified evaluation measures

This is a new normative annex and includes the requirements to be applied in case of high integrity risk. FSC introduces a risk-based approach at evaluation level for a supply chain or for certificate holders operating in an environment where existing conditions prevent a certification body from detecting nonconformities. The annex serves as a basis for the implementation of specified evaluation measures to mitigate the integrity risks as identified by FSC.

49. Do you agree with the requirements included in Annex 4?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

Annex 5 Closure of nonconformities (informative)

This is an informative annex and added to Draft 2-0 to visually present the system for closure of nonconformities. Please note that the flow chart does not present the full functional approach as presented in ISO/IEC 17000:2020 Conformity assessment — Vocabulary and general principles. The purpose of this flow chart is to present the flow of closure of nonconformities and key timelines.

50. Do you have any feedback to the flow chart as presented in Annex 5?

Annex 6 Procedure for transfer of FSC certification and license agreement for FSC certification scheme

This a new normative annex and replaces the <FSC-PRO-20-003 Transfer of FSC Certificates and License Agreements>. This reduces the number of normative documents and merges the relevant requirements. The key changes in this procedure include:

Terms for 'preceding' certification body and 'succeeding' certification body are changed to 'issuing' certification body and 'accepting' certification body.

Fundamental principles of transfer of certification

- Transfer at recertification counts towards the allowable limit to transfer once per certification for new certification cycles (ref. clause 1.1 in Annex 6)
- Issuing certification body to not suspend, terminate or withdraw the certification if the client is in conformity with the certification requirements (ref. clause 1.3 in Annex 6)
- Responsibility of the accepting certification body to resolve the open complaints against the transferred client (ref. clause 1.2 in Annex 6).

Transfer process for voluntary transfer of certification

- Minimum thirty (30) days' notice to issuing certification body. No response for the issuing certification body to the transfer request will automatically lead to the transfer of certification (ref. clause 2.4 in Annex 6).
- Clarity provided around conducting a transfer audit within 3 months of the agreed transfer date (ref. clause 2.5 in Annex 6).

Transfer process for non-voluntary transfer of certification

- Clarified the process for non-voluntary transfer of certification and the requirements that do not apply in cases of non-voluntary transfer.

51. Do you agree with the requirements included in section 1 of Annex 6 (fundamental principles for transfer)?

a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

52. Do you agree with the requirements included in section 2 of Annex 6 (voluntary transfer)?

a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

53. Do you agree with the requirements included in section 3 of Annex 6 (non-voluntary transfer)?

a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

54. Do you agree with the requirements included in section 4 of Annex 6 (migration of records)?

a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

55. Do you have any other feedback to Annex 6?

C. FSC-PRO-20-004 V2-0 D1-0 Auditor Training Programme

This procedure specifies requirements for establishing and implementing an Auditor Training Programme and defining the content of the trainings. This procedure aims to equip an auditor auditing a management unit or a site against FSC certification requirements with the required knowledge and skills to achieve the audit objective. The objectives of this procedure are to:

- 1) ensure a professional implementation of the Auditor Training Programme; and
- 2) define the general content and duration of courses for an initial training on FSC (one component of the Auditor Training Programme).

This procedure is divided into two parts where Part 1 sets the implementation requirements for initial training of FSC auditor candidates and for on-going training of FSC auditors. Part 2 is only about the initial training.

Part 1 Implementation Requirements for the Auditor Training Programme

Key changes introduced to the part 1:

- A) Records for implementation of the training programme to be maintained for at least ten (10) years instead of seven (7) years (ref. clause 2.2.1 from the FSC-PRO-20-004 Draft 1-0).
- B) For CoC trainings, lectures may be presented online for both initial and ongoing trainings (ref. clause 3.3.5 from the FSC-PRO-20-004 Draft 1-0).
- C) For FM trainings, presenting lectures online shall be linked with in-person sessions for initial training. For ongoing trainings lectures may be presented fully online (ref. clause 3.3.6 from the FSC-PRO-20-004 Draft 1-0).

Part 2: Content and Duration Requirements for the Auditor Training Programme

Key changes introduced to the part 1:

- A) Training provider to consider the additional material developed by FSC into the training content (ref. clause 4.3 from the FSC-PRO-20-004 Draft 1-0).
- B) FM training content to include database entry requirement, evaluation approaches and audit scenarios (ref. clause 4.3 from the FSC-PRO-20-004 Draft 1-0).
- C) CoC training content to include concepts of product groups, material sourcing, system for controlling the claim and FSC core labour requirements (ref. clause 4.3 from the FSC-PRO-20-004 Draft 1-0).

56. Do you agree with the requirements included in Part 1 of FSC-PRO-20-004 Draft 1-0?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

57. Do you agree with the requirements included in Part 2 of FSC-PRO-20-004 Draft 1-0?

- a) Strongly agree, b) Agree, c) Neutral, d) Disagree, e) Strongly Disagree

Please explain your rationale

58. Do you have any other feedback to the FSC-PRO-20-004 Draft 1-0?

Thank you for participating in this consultation for the joint revision. Should you have any questions related to this revision process, please write to us at: systemdevelopment@fsc.org